

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No. 22-14986</b>
	)	
<b>LAKESHA STEWARD,</b>	)	<b>Chapter 7</b>
	)	
<b>Debtor.</b>	)	<b>Hon. A. Benjamin Goldgar</b>

**NOTICE OF MOTION**

*To the following persons or entities who have been served via electronic mail:*

U.S. Trustee: [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

Deborah Kanner Ebner, Chapter 7 Trustee: [dkebner@debnertrustee.com](mailto:dkebner@debnertrustee.com)

Gregory Stern, Attorney for Debtor: [greg@gregstern.com](mailto:greg@gregstern.com)

*To the following persons or entities who have been served via U.S. Mail:*

Lakesha Steward, Debtor, 3072 Saint Ives Lane, Richton Park, IL 60471

PLEASE TAKE NOTICE that on April 10, 2032, at **9:30 A.M.**, I will appear before the Honorable Judge **GOLDGAR**, or any judge sitting in that judge's place, **either** in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present **Tsujiorika C. Walker's Motion to Extend Time to Object to Discharge or Dischargeability Under 523/727**, a copy of which is attached.

**All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.**

You may appear electronically by video or by telephone.

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is **161 500 0972** and the password is **726993**. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Carolina Y. Sales  
Attorney for Tsujiorka C. Walker

Carolina Y. Sales (ARDC #6287277)  
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### **CERTIFICATE OF SERVICE**

The undersigned certifies that copies of this Notice and the attached motion were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail, on or before March 31, 2023 at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: March 31, 2023

/s/ Carolina Y. Sales

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

<b>In Re:</b>	)	<b>22-14986</b>
	)	
<b>LAKESHA STEWARD,</b>	)	<b>Chapter 7</b>
	)	
<b>Debtor.</b>	)	<b>Hon. Judge: GOLDGAR</b>

**MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE  
OR DISCHARGEABILITY UNDER 523/727**

Tsujiorka C. Walker (the “Creditor”), by his attorneys, Bauch & Michaels, LLC, pursuant to Fed. R. Bankr. P. 4004 and 4007, moves the Court for an order extending the time to object to discharge or dischargeability under 11 U.S.C. §§ 523 and 727, stating as follows:

1) Jurisdiction is proper and venue is fixed in this Court with respect to these parties.

2) On December 29, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to Chapter 7 under Title 11 USC.

3) Prior to the Petition Date, the Debtor injured the Creditor in a motor vehicle accident.

4) The Creditor was awarded a judgment against Debtor in the amount of \$827,868.00. *See* Schedule F [ECF No. 1].

5) Pursuant to the litigation between the Creditor and the Debtor, the Debtor has a possible cause of action against her insurance agency, United Equitable Insurance (“UEI”), for bad faith. *See* Amended Schedule B [ECF No. 9].

6) This possible cause of action is an asset of the bankruptcy estate.

7) If the Debtor succeeds on her cause of action against UEI, the Debtor's creditors would receive payment for their claims in full.

8) If a discharge is entered for the Debtor before she proceeds against UEI, then it could potentially eliminate the cause of action against UEI and harm the Debtor's creditors.

9) Upon motion, a court may extend the time to object to discharge or dischargeability of a debt for cause. Fed. R. Bankr. P. 4004(b), 4007(c).

10) Cause exists to extend the time to object to discharge or the dischargeability of the debt that the Debtor owes to the Creditor, as the entry of a discharge would negatively affect the Debtor's creditors.

11) This motion has been filed before the April 3, 2023 deadline to object to discharge or the dischargeability of a debt has expired.

WHEREFORE, the Creditor prays that this Honorable Court extend the deadline to object to the Debtor's discharge or dischargeability of a debt to July 3, 2023 and for other such relief as the Court deems fair and proper.

Dated: March 31, 2023

Respectfully Submitted,

/s/ Carolina Y. Sales  
Attorney for Tsujiorka C. Walker

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